



**PACIFIC FOREST TRUST**  
Private Forests. Public Treasures.

Paul Massera  
California Water Plan Update 2013  
California Department of Water Resources  
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Sacramento, CA 94236-0001

Copy sent via email to: [cwpcom@water.ca.gov](mailto:cwpcom@water.ca.gov)

November 18<sup>th</sup> 2013

Dear Mr. Massera,

The Pacific Forest Trust (PFT) welcomes the opportunity to comment on the Forest Management chapter of the draft revisions to California's Water Plan. Given the critical importance of the forested watersheds that supply California's water, the inclusion of this chapter is welcome. The state cannot adequately prepare for the challenges that await its water system as a result of climate change and a growing population without addressing the forests that initially collect, filter and store the state's water.

We encourage the Department of Water Resources (DWR) to consider forested watersheds as both 1) physical infrastructure to be conserved, and 2) hydrological services that need to be maintained. While the draft Forest Management chapter focuses on ensuring that the services of forested watersheds are maintained, it is as important to ensure that the physical infrastructure of the forest is conserved as well. PFT believes that conservation easements are the most cost-effective and permanent method of conserving this vital water infrastructure, and that they should be highlighted as a policy option in the final Forest Management chapter of the Water Plan.

*The revised Water Plan and the Integrated Regional Water Management Plan (IRWMP) process*

We understand that the Water Plan will provide critical guidance to IRWMPs over the next few years as they plan to conserve and protect California's water resources. Therefore we hope that the Forest Management chapter will include policy recommendations tailored specifically to those IRWMPs that supply the vast majority of the state's runoff.

The relationship between the Water Plan and the IRWMPs make it critical that the Water Plan include a broad suite of policies – including those specifically related to forests – that can be used to implement IRWMP-level priorities.



### *Fuel treatment recommendations*

PFT whole-heartedly agrees with the draft Forest Management chapter's general endorsement of certain fuel treatments to reduce wildfire risk and restore ecosystem services. These are important mechanisms to ensure that California's forests achieve climate resiliency and continue to provide the hydrological ecosystem services that Californians have taken for granted for decades. However, these fuel treatments should be carefully planned and should not detract from overall forest health or restoration efforts.

PFT strongly supports finding new sources of revenue to pay for watershed restoration. We believe the draft Forest Management chapter could add significant value to the Water Plan if it made some general suggestions around potential new sources of revenue that could be used specifically for forest restoration projects in those watersheds that supply the majority of California's runoff. For example, a percentage of water agency budgets could be dedicated for watershed restoration activities that result in tangible benefits to water ratepayers.

### *Public education*

As DWR is aware, roughly 33% of Southern California's urban and agricultural water comes from Northern California's watersheds. PFT believes that outreach and public education in Southern California on the costs and benefits of watershed restoration is important and we support the draft Forest Management chapter's general recommendation in this regard.

### *Further suggestions for the draft Forest Management chapter*

PFT's view is that while the draft Forest Management chapter represents a good beginning, there is additional policy guidance that DWR can provide to help guide the restoration of California's forests and ensure they continue to provide water security as well as water quality. This additional guidance, outlined below, is all the more important given the relationship between the Water Plan and the IRWMP policy process.

PFT urges DWR to focus on private forestlands as they generally make up 50% of the state's forested landscapes (federal lands make up the other 50%). While the US Forest Service and other federal agencies are taking steps to pursue restoration, private forestlands are critical in creating unified, restored forest landscapes. Without due focus on private forestlands, landscape-scale restoration that secures the hydrological services of forest watersheds will be next to impossible.



We also believe that DWR should more pointedly highlight the contribution of forested watersheds to the mitigation of statewide greenhouse gas (GHG) emissions. Water conveyance and treatment is one of the state's larger sources of GHG emissions. DWR should coordinate carefully with the Air Resources Board and other agencies to reduce and mitigate the GHG impacts of California's water conveyance and treatment system, and reflect that coordination in the Forest Management chapter.

Specific policies that we believe DWR should endorse in the Forest Management chapter include conservation easements on private forestland, and mitigation of the loss of private forestland when it is converted to other uses. These policy options are described in more detail below.

- Conservation easements are legal obligations that run with the land and restrict certain forms of development and conversion, thereby permanently enhancing and preserving the hydrological services provided by forests. Conservation easements are a proven and cost-effective tool for achieving protections against development and its negative impacts on hydrological services.
- Mitigation of converted forestland is another option that should be consistently endorsed by state agencies across the board, and by DWR specifically in the Water Plan. When forestland is converted to other uses the state suffers a loss of net hydrological services. At the moment, there is not a clear statewide policy for addressing these conversions and their impacts, particularly with regard to the conversion of California's most important watersheds.

### *Conclusion*

In general, PFT believes that the draft revisions to the DWR Water Plan's Forest Management chapter present the state with an excellent opportunity to describe the steps that should be taken to conserve the hydrological services of California's forests. This is especially important in the face of climate change and the need to both restore and maintain resiliency of the forested watersheds that supply the state's water.

This resiliency will secure the existing contribution of California's forests to the state's water supply that we rely on, and in many cases may enhance it. DWR should take this opportunity to establish policy recommendations for:



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- Fuel treatments that restore the forest and ensure a resilient condition that can adapt to the impacts of climate change and population growth.
- Securing hydrological functions through conservation easements that permanently conserve intact forest landscapes.
- Conservation mitigation that offsets development and conversion of forest landscapes.

Thank you for the opportunity to comment and for your attention to this letter. Please contact me if you have any questions about our comments or wish to discuss PFT's comments in more detail. I can be reached at (415) 561-0700 x39 or by email at [pdoherty@pacificforest.org](mailto:pdoherty@pacificforest.org).

Sincerely,

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